

No. 24-5516

**In the United States District Court for
the Middle District of Tennessee**

LUCAS V. VANDERBILT UNIVERSITY

IAN HUNTER LUCAS
Plaintif

v.

THE VANDERBILT UNIVERSITY
Defendant

No. 3:24-cv-00440

District Judge: Hon. Waverly D. Crenshaw
Magistrate Judge: Hon. Jeffery S. Frensey

PLAINTIFF EXHIBIT F

Ian H. Lucas
Plaintiff-Appellant, Pro Se
221 Charleston Ave
Pleasant View, Tennessee 37146
Telephone: 910-87-3577
Email: lucasianhunter@outlook.com

Plaintiffs EXHIBIT F

EXHIBIT F

Proof of Vanderbilts False and Misleading Statements of defamation and libel slandering to gain community vilification of plaintiff in regard to "covenant school shooting" by claiming and falsely accusing plaintiff of being a nonexistent and not involved and also even claiming that plaintiff was not even "work at Nashville Fire Department"

Plaintiff had an exam via remote protocol every Monday morning at 0800, plaintiff worked the night prior and took his exam Monday morning. Plaintiffs colleague Aaron Read covered for Plaintiff by swapping shifts. Plaintiff was taking his exam when the tragedy occurred, Vanderbilt had made this a personal attack and also vilified, mocked, falsified and disrespected the plaintiffs, there families, and the first responders with an attempt to gain some sort of recognition or heroism for "taken down an enemy [plaintiff]" in an attempt to conjure up more donations, it is beyond belief and simply sickens the plaintiff beyond comprehension.

Section 1:

Evidence shows that Plaintiff Lucas traded shifts with a co-worker at the Nashville Fire Department, as Lucas has attested. All other assertions by Vanderbilt University are fraudulent, defamatory, and slanderous. Moreover, the plaintiff's outside employment is unrelated to and does not impact his studies at the School of Nursing. Therefore, all ex-parte communications by Mr. Bourgoin discussing the plaintiff's academic records and student information violated FERPA and were deliberate acts of defamation and character assassination, intending to inflict harm through false and misleading information. These actions also contributed to the wrongful constructive discharge of Mr. Aaron Read from the Nashville Fire Department, for which Vanderbilt University and Mr. Jeremy Bourgoin are directly responsible.




March 27, 2023
7:30 AM

Edit

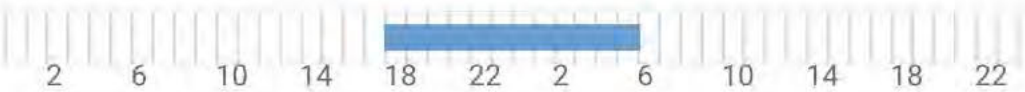


PHOTO OF LUCAS ON SHIFT MORNING OF 03/27/2023
STUDYING AT FIRE STATION 06 PRIOR TO ONLINE EXAM
AT 0800



Shift Trade Working EMS PM 

From	Through	Hours
18:00	06:00	12



Account

Note

Lucas, Ian H. working for Read, Aaron L. EMS PM 03/26/2023
Read, Aaron L. working for Lucas, Ian H. EMS AM 03/27/2023


Cover Person

Limited to 1 item 

 Read, Aaron L.

Display All

Work Code

Shift Trade Not Working EMS PM 

Note

 Add? 



[More details](#)

Cancel

Save



Nashville
March 27, 2023 7:50 AM

Edit



USING AMBULANCE WIFI AND LAPTOP STUDY FOR EXAM AS IT WAS MORE QUIET



2:33

5G E 45



Home

March 27, 2023 7:43 AM

Edit



LOGIN FOR THE EXAM

EXAM INFORMATION

or Course:

Pick Your Exam Teacher/Sponsor or Course

Your Exam:

Pick Your Exam Teacher/Sponsor or Course

teacher, course

NURS 5203-01 Human Exper Health Illness II (2023S)

NURS 5206-01 Pharmacology Nursing Care II (2023S)

NURS 5610-01 Fundamentals Clinical Practice (2023S)

NURS 6010-01 Advanced Pathophysiology (2023S)

NURS 6020-01 Adv Pharmacotherapeutics (2023S)

NURS 6022-01 Adv Physiology Pathophysiolo (2023S)

tion.



publicsafetyinfo@vanderbilt.edu
info@vupublicsafety.com

To: You ian.h.lucas.1@vanderbilt.edu

Saturday, October 14, 7:37 PM



Today, October 14, 2023, at 12:06 PM, VUPD received a report that a white Honda Accord had been stolen from Lot 5A. This incident is associated with five vehicles being broken into between Lots 5A, 12A, and Terrace Place. Camera footage revealed that [at 5:30 AM](#) a large dark truck pulled into Lot 5A, and the unidentified occupants exited the vehicle and smashed out the windows of vehicles in Lot 5A, Lot 12A, and on Terrace Place. Two of the occupants entered the Honda Accord and were last seen driving toward 20th Avenue. In addition to these reports, **VUPD received a report that a Subaru was stolen from Wesley Place Garage on Friday, October 13, 2023.**

Police are actively investigating these incidents.

This Security Notice is being issued to remind the Vanderbilt community to:

- Secure any items such as identification, keys, wallet, purse, or other valuables. Do not leave valuables visible in your vehicle.
- Lock your vehicles and ensure your windows are secure.
- Report any suspicious persons to VUPD. Try to describe the person(s) as best you can.

Vanderbilt community members are encouraged to download the [VandySafe](#) app to:

- Contact VUPD via phone call or real-time chat.
- Trigger a mobile Bluelight that shares your location instantly

with VUPD.

- Initiate a "Virtual Walkhome" where VUPD can monitor your

CAMPUS SAFETY ANNOUNCEMENT DISTRIBUTED TO ALL STUDENTS, FACULTY AND STAFF
WHEN THE PLAINTIFF EMAILED HIS FACULTY TO INFORM THEM OF THE SITUATION

According to faculty attestations, Defendant Mary Ann Jessee essentially informed the plaintiff's faculty that he was lying and instructed them not to provide any additional extensions or support. She emphasized that the plaintiff already receives an "exceeding" amount of accommodations and that his car was not stolen.



Vanderbilt University Police Department

The Vanderbilt University Police Department is a professional law enforcement agency dedicated to the protection and security of Vanderbilt University and its diverse community.

To fulfill this mission, we will:

- Deliver superior law enforcement services with integrity and pride.
- Respect and safeguard the dignity and rights of all individuals.
- Demonstrate respect toward the people we serve and one another to maintain an environment of trust.
- Develop partnerships with all segments of our community through effective communication and collaboration.
- Carefully select and maintain well-trained, educated and professional staff.
- Accept individual responsibility and accountability for our actions.

Vanderbilt University Police Department is proudly accredited locally, nationally, and internationally.



Fwd: 5815 course information



Jessee, Mary Ann
To You

1:19 PM

...



Hello Ian,

There has been an anonymous allegation that you improperly accessed patient information in the VUMC health record this semester. The course coordinators are investigating this allegation and I have recommended your grade for 5815 Nursing Care of Childbearing Families be changed to an incomplete while the investigation is in process. As the program dean, I wanted you to understand the reason for the grade change if you saw it. You will be contacted as is deemed necessary as the investigation progresses.

Thank you,
MAJ

Mary Ann Jessee, PhD, RN, CNE, ANEF
Professor of Nursing
Assistant Dean for Academics, Generalist Nursing Practice
Vanderbilt University School of Nursing, Room 544

[461 21st Avenue South, Nashville, TN 37240](#)

Office [\(615\) 343-1629](tel:6153431629) | mary.a.jessee@vanderbilt.edu

@majnotmadge

She, her, hers

Strengths: Relator | Learner | Responsibility | Achiever | Analytical

MARY ANN JESSEE EMAIL TO LUCAS ON DEC 12 2023, WHEN VUPD AND UCC WELLNESS PANEL COMPLETED THERE ASSESSEMENT AND DETERMINED NO CREDIBILITY TO ANY ALLEGATIONS OF THE ANNYMOUS COMPLAINTS AND THAT LUCAS WAS NOT A THREAT TO CAMPUS, COMMUNITY OR PERSONAL SAFETY.

It has since been determined that G.L. BLACK requested JESSEE to falseify the above annymous complaints and to pursue a false investigation with fradulent and wrongful outcomes leading to a academic dismissal that was wrongful against LUCAS.

G.L. BLACK as noted throught multiple evidentary exhibits has emonstrated a history of falseification and fradulent conduct.

RE: Clinical Issue

Jessee, Mary Ann mary.a.jessee@Vanderbilt.Edu

Lucas, Ian H ian.h.lucas.1@Vanderbilt.Edu, Robbins, Heather M

heather.m.robbins@Vanderbilt.Edu, Weaver, Angela angela.weaver@Vanderbilt.Edu

Lewis, Feylyn feylyn.m.lewis@Vanderbilt.Edu

Thu, Jun 1, 2023, 5:11PM

Hello Ian,

Thank you for reaching out with your concerns. First, I want to let you know that the meeting tomorrow is not to dismiss you from the program, but is a meeting with the course coordinator per the process outlined in the syllabus to review clinical competency achievement and expectations moving forward for the current course. It is occurring in my office with me and Professor Weaver because Dr. Robbins is in practice tomorrow. There is no other reason I am involved at this point.

Regarding your initiation of the complaint process, per the policy in the VUSN Handbook here https://nursing.vanderbilt.edu/students/current/handbook/academic_regulations.php#complaint, I need to know the following information in order to advise you:

1. Are you initiating a 1) grade related or 2) non-grade related complaint (per the description in the Handbook at the link above).
2. Have you brought these concerns/complaint to Professor Harris? The complaint process generally begins with the complaint being directed to the person whose actions or inactions have contributed to the complaint. In this case, per your email, that would be Professor Harris. Given the specific nature of the complaints and their direct connection to Professor Harris, I recommend you start with her.

I am happy to discuss this process in person with you tomorrow after classes if it would be helpful to you as you consider these questions.

5815 course information

Jessee, Mary Ann <mary.a.jessee@Vanderbilt.Edu>

Mon 12/11/2023 1:19 PM

To: Lucas, Ian H <ian.h.lucas.1@Vanderbilt.Edu>

Hello Ian,

There has been an anonymous allegation that you improperly accessed patient information in the VUMC health record this semester. The course coordinators are investigating this allegation and I have recommended your grade for 5815 Nursing Care of Childbearing Families be changed to an incomplete while the investigation is in process. As the program dean, I wanted you to understand the reason for the grade change if you saw it. You will be contacted as is deemed necessary as the investigation progresses.

Thank you,

MAJ

Mary Ann Jessee, PhD, RN, CNE, ANEF

Professor of Nursing

Assistant Dean for Academics, Generalist Nursing Practice

Vanderbilt University School of Nursing, Room 544

461 21st Avenue South, Nashville, TN 37240

Office (615) 343-1629 | mary.a.jessee@vanderbilt.edu

@majnotmadge

She, her, hers

Strengths: Relator | Learner | Responsibility | Achiever | Analytical

***10/17/23 Tuesday:**

- Student accessed patient ES (patient from 10/17 6:30-2:30 clinical day) at 20:49 – 20:55 and printed a note from chart review.
- Student accessed patient NES (presumably the infant of patient ES from 10/17 6:30-2:30 clinical day) at 21:40 – 22:55.

10/24/23 Tuesday: missed clinical. Accessed his own record and exported something.

10/31/23 Tuesday: Confirmed VUSN clinical day from 6:30am-2:30pm with patients BLP

***11/01/23 Wednesday:** Course conference time at VUSN (no accessing of patient information is allowed from VUSN, and students are not considered part of the care team once they leave the hospital unit on which they were caring for the patient)

- Student accessed patient BLP (patient from 10/31 6:30-2:30 clinical day) at 12:58. Patient was accessed again at 14:03.
- Student accessed patient JCL (presumably the infant of patient BLP from 10/31 6:30-2:30 clinical day) at 13:39

11/06/23 Monday: Student accessed his own records.

11/07/23 Tuesday: Student did not attend clinical.

11/18/23 Saturday: Shade Tree work

- Student accessed patient SS at 18:32
- Student accessed patient CH at 18:59
- Student accessed patient YZ at 19:12
- Student accessed patient MBA at 19:15
- Student accessed patient MR at 19:18
- Student accessed patient BY at 19:20
- Student accessed patient MH at 19:24

Additionally, it is important to note that these issues occurred during the N5815 course, which took place from 10/17/2023 to 12/4/2023. None of these dates were relevant to the N5825 (from 08/23-10/23) course, for which Instructor Jessee also changed the student's course grade to fail. This further indicates a pattern of unfair treatment and manipulation of academic records by JESSEE

11/20/23 Monday: Shade Tree work

- Student accessed patient VGG at 10:20

12/1/23 Friday: Student accessed his own records.



10/17/23: Note this is after Lucas Care is stolen and also Lucas personal laptop was in his car, thus JESSEE making an accusation that LUCAS was “remote charting” is without merit as LUCAS had no means to “remote” chart without a laptop and no funds to secure such until insurance replaced the laptop that was stolen

11/01/23: The contradiction between the points on 10/17/23 and 11/01/23 highlights the inconsistency and potential fraudulent behavior of the instructor in pursuing disciplinary action against the student. On 10/17/23, the student accessed patient records and printed a note from the chart review after their clinical shift, indicating that such actions were not prohibited or enforced as a rule at that time. However, on 11/01/23, that JESSEE claimed that students are not allowed to access patient information once they leave the hospital unit. This inconsistency demonstrates that the instructor is using arbitrary and unfounded assertions to unfairly target the student, further supporting the claim of fraudulent and unjust behavior.

RECEIVED

By Susan Hintz at 8:41 am, Dec 12, 2023




VANDERBILT UNIVERSITY
Office of the UNIVERSITY REGISTRAR

Petition for Change of Grade or Submission of Final Grade

Lucas	Ian	Hunter	000322273	VUSN
Last Name	First	Middle	Student ID #	School
NURS 5815			2023 Fall	
Course Number (formatting example: SPAN 2203 01)			Year and Term (formatting example: 2018 Spring)	

Change the **Original Grade** submitted for this student from P to I

- ☒ This is a request for a grade change. **By Faculty regulations, a grade reported and recorded can only be changed upon the instructor's written request.** Such a change can be approved only on certification that the originally reported grade was in error.
- ☐ This is the submission of a final grade that replaces a grade originally reported as incomplete (**I, M, MI, H, IP**)
- ☐ This is the submission of a final grade for a course in which no previous grade was submitted.

Heather Robbins		12/11/2023
Instructor's Name (printed)	Instructor's Signature	Date
Sara A. Donahoe		
Digitally signed by Sara A. Donahoe Date: 2023.12.11 17:33:57 -06'00'		
Authorized Signature		Date

[View](#) [Edit](#) [Close](#) [Delete](#) [Save](#) [Submit](#) [Refresh](#)

Online Grade Change Request

Student EMPLID	Student VUnetID	Student Name
000322273	lucasih1	Lucas, Ian Hunter

Class Subject	Catalog Number	Section	Description
NURS	5815	01	Nursing Care of Childbearing Families

Term	Session	Instructor(s)
1015	1	Robbins, Heather M. Weaver, Angela M.

Assigned Grade	New Grade
P	F

Grade Change Reason	Requestor Name
Grade change due to violation of academic policies	Robbins, Heather M

Request Submission Date	Request Result	Reviewer Name	Review Date
2023-12-15 17:07:06	Approved	Donahoe, Sara A	12-16-2023

[View](#) [Edit](#) [Close](#) [Delete](#) [Save](#) [Submit](#) [Refresh](#)

Online Grade Change Request

Student EMPLID	Student VUnetID	Student Name
000322273	lucasih1	Lucas, Ian Hunter

Class Subject	Catalog Number	Section	Description
NURS	5825	01	Nursing Care of Adults with Complex Illness

Term	Session	Instructor(s)
1015	1	Robbins, Heather M. Weaver, Angela M.

Assigned Grade	New Grade
P	F

Grade Change Reason	Requestor Name
Grade change due to violation of academic policies	Robbins, Heather M

Request Submission Date	Request Result	Reviewer Name	Review Date
2023-12-15 17:08:07	Approved	Donahoe, Sara A	12-16-2023

Grade Change Notification

From: Office of the University Registrar

Sent: Dec 16, 2023 12:00 AM



VANDERBILT UNIVERSITY
Office of the University Registrar

Grade Change Notification

Dear Ian,

The Office of the University Registrar has posted an approved change of grade to your academic record for **NURS 5815 01 – Nurs Care Childbearing Families** taken in **2023 Fall**.

You can see the updated grade via the Academic Record application.

If you have any questions about this grade change, please contact your instructor.

Best wishes,
Office of the University Registrar
110 21st Avenue South, Suite 110
615-343-4306
Email: university.registrar@vanderbilt.edu
Web: [Office of the University Registrar](#) | [Enrollment Bulletin](#)

Grade Change Notification

From: Office of the University Registrar

Sent: Dec 16, 2023 12:00 AM



VANDERBILT UNIVERSITY
Office of the University Registrar

Grade Change Notification

Dear Ian,

The Office of the University Registrar has posted an approved change of grade to your academic record for **NURS 5825 01 – Nurs Care Adult Complex Illnes** taken in **2023 Fall**.

You can see the updated grade via the Academic Record application.

If you have any questions about this grade change, please contact your instructor.

Best wishes,
Office of the University Registrar
110 21st Avenue South, Suite 110
615-343-4306
Email: university.registrar@vanderbilt.edu
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NOTE THAT MARY ANN JESSEE CHANGED COURSE GRADE IN NURS 5825 HOWEVER NO EVIDENCE OR HER "INVESTIGATION" DEMONSTRATED ANY WRONG DOING IN EITHER NURS5815 OR NURS5825

IN FACT: STUDENT DID NOT HAVE ACCESS TO THE MEDICAL RECORDS DUE TO A ADMINISTRATIVE BACKLOG FOR MUCH OF NURS5825

THUS THIS DEMONSTRATES THAT MARY ANN JESSEE ACTIONS ON BEHALF OF VANDERBILT AND G.L. BLACK WERE IN FACT MALICIOUS WITH INTENT TO CAUSE HARM AS THERE WAS NEED FOR LUCAS TO HAVE FAILED 2 COURSES TO WARRANT AND AUTOMATIC DIMSMISSAL.



Moore, Kerry E

12:27 PM

To Jessee, Mary Ann, You, Jamerson, Neil E, +1

...

⊖ PERMISSIONS - Restricted

You don't often get email from kerry.e.moore@vumc.org. [Learn why this is important](#)

Hi Mary Ann & Ian – since these documents were placed in a shred bin there is no breach. Thank you for reaching out to the Privacy Office.

Kerry

Kerry E. Moore, MHIIM, RHIA
Program Manager, Privacy Office
Vanderbilt University Medical Center Privacy.Office@VUMC.org |
Phone [615.936.3594](tel:615.936.3594) | fax [615.343.6966](tel:615.343.6966) | Kerry.e.moore@vumc.org

...

VANDERBILT UNIVERSITY PRIVACY OFFICE STATING THERE WAS NO BREACH IN PRIVACY

THUS ALL ARGUMENTS BY VANDERBILT UNIVERSITY FOR THE ACADEMIC DISMISSAL FAIL ON THERE FACE

SECTION 2:
VUPD DET. NEWSOME PERJURY ABOUT “LUCAS FALSE STATEMENT ABOUT ACCESS TO FIREARMS”

RE: Regarding Case Number: 2023170101

Lucas, Ian H ian.h.lucas.1@Vanderbilt.Edu

Student Accountability studentaccountability@Vanderbilt.Edu

Tue, Dec 19, 2023, 3:03 PM

Hello,

I am emailing you regarding Case Number: 2023170101 and next steps to resolve the reports related to the related case.

Sincerely,

Ian Lucas

Get [Outlook for iOS](#)

Student Accountability studentaccountability@Vanderbilt.Edu

Lucas, Ian H ian.h.lucas.1@Vanderbilt.Edu

Wed, Dec 20, 2023, 8:57 AM

Hi Ian,

The reported matters that need resolved to remove your campus restriction include ones from the faculty and administration in the School of Nursing that you have reported for discrimination. You will first go through EOA's discrimination process so that we have a determination on whether their actions against you were discriminatory or not. If discriminatory, then the basis for those components of Accountability matters would need revisited.

From: Newsom, Joel D <joel.d.newsom@Vanderbilt.Edu>
Sent: Thursday, December 7, 2023 1:03:39 PM
To: Sutton, Tommye S <tommie.s.sutton@Vanderbilt.Edu>
Cc: Conwell, Patrick S <p.conwell@vanderbilt.edu>; King, Angela T <angela.t.king@Vanderbilt.Edu>
Subject: Ian Lucas update

Good afternoon,

ATF Agent Doris notified me this morning that they've found that Ian Lucas purchased a firearm in Clarksville, TN in May of this year. He neglected to mention that when Dr. Porter asked him specifically about his access to guns during our interview. I have reached out to Mr. Lucas about sitting for another interview. We will be meeting at 2800 Vanderbilt Place tomorrow at 2pm to go over this information as well as the classmates' assertions regarding his carrying of weapons. He is unavailable before then due to hosting a study group today for their final that will be given tomorrow 8am-1pm.

Detective Joel D. Newsom

Lieutenant – Criminal Investigations Unit
Vanderbilt University Police Department
111 28th Avenue South Nashville, TN 37212
Email: joel.d.newsom@vanderbilt.edu
Phone: (615) 322-2745

From: Newsom, Joel D <joel.d.newsom@Vanderbilt.Edu>
Sent: Friday, December 8, 2023 2:28:22 PM
To: Sutton, Tommye S <tommie.s.sutton@Vanderbilt.Edu>
Cc: Conwell, Patrick S <p.conwell@vanderbilt.edu>; King, Angela T <angela.t.king@Vanderbilt.Edu>
Subject: Ian Lucas update

Good afternoon, Chief.

Ian Lucas just called me on the phone and had his attorney, Adrian Bohnenberger, on the call. Mr. Bohnenberger asked me why multiple police interviews were being requested. I explained that the university had received two anonymous complaints about Mr. Lucas making statements that made the complainant unsafe. Mr. Bohnenberger asked what specifically was said in the complaint and I replied that I had gone over those statements with Mr. Lucas on Monday. I then explained that since Monday I had been following up with Mr. Lucas's classmates. Some of the classmates had supplied information saying that he had made statements of carrying a weapon to their IPE Clinicals. I also said the purpose of today's interview was to ask Mr. Lucas face-to-face about the nature of the IPE Clinicals and where they were located. Mr. Lucas verified that the clinicals are at Madison Towers, an off-campus location in a high-crime area where he does not feel safe going, but he has never carried his firearm to that location. I then asked, "So you do own a firearm?" Mr. Lucas and Mr. Bohnenberger both chimed in and said that he is a registered owner of a Glock handgun. Mr. Lucas stated that he has it for home protection and that he has never carried outside of his home even though he has a valid carry permit (that is not required in the State of Tennessee).

I then told Mr. Lucas that was all that I was wanting to talk about. Mr. Lucas then asked if we still needed to meet at 2. I said no and that he answered the questions I needed answers to. Mr. Bohnenberger asked if there had been anything criminal in nature found and I said no. I also explained that this had been communicated to other departments within the university by our department's administration. I was then asked about the campus ban. I stated that the campus ban was placed by the Dean of Students office and was not something controlled by our department.

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Phone: (615) 322-2745

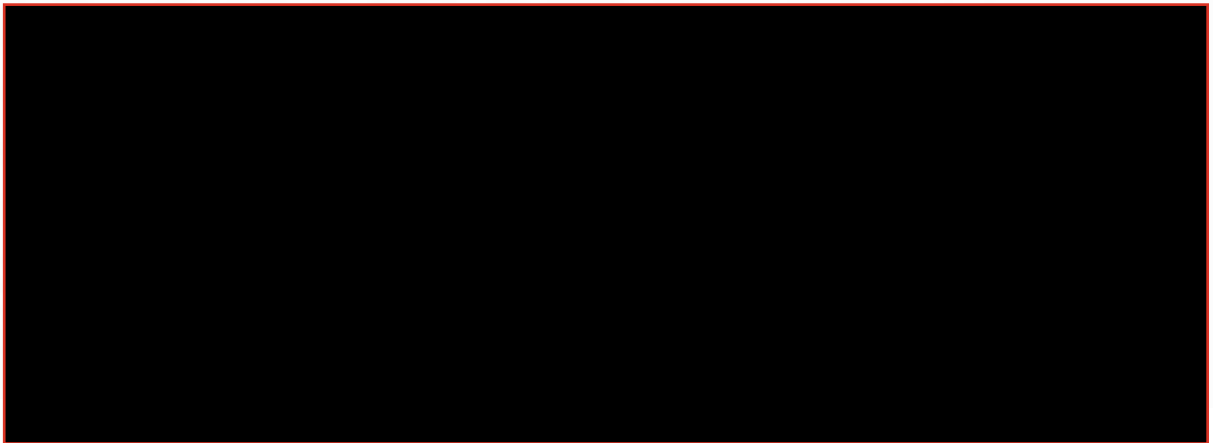
Porter: What about your access to weapons?

Lucas: My access to weapons?

Porter: Uh-huh.

Lucas: Do I - I have access to weapons, but not like in my house or anything, no.

Porter: Not in your house? Where's the access at?



Ian Lucas
Packet of Allegations
Table of Contents

I.	Providing False Information During Threat Assessment Process Allegations	
a.	VUPD Det. Newsom summary	
b.	VUPD Det. Newsom call with Ian Lucas and attorney	
c.	Transcript of interview	
d.	Follow-up with VUPD Det. Newsom	
II.	Defrauding SCAP Funds Allegations	
a.	Incident report submitted by Lisa Clapper on 12/12/23	Note the date is the same as the date of report submitted by JESSEE, Coordinated Conspiracy and planned attack on Plaintiff
b.	List obtained from police of first responders	
c.	Emails where Ian stated he was a Covenant first responder	This list of emails has never been shown to Plaintiff,
d.	Summary of follow-up with NFD	Ex-Parte communication with the students former employer is retaliatory and illegal in violation of FERPA
III.	Forgery of an Excuse Note Allegations	
a.	Incident report submitted by Dr. Jessee on 12/12/23	Note the date is the same as the date of report submitted by JESSEE, Coordinated Conspiracy and planned attack on Plaintiff
b.	Allegedly forged note	
c.	Faculty review of allegedly forged note	
IV.	Submission of Fake Faculty Report to EOA Allegations	
a.	Incident report submitted by Dean Neil Jamerson on 1/4/24	Information was taken from the EOA system without consent, and Neil Jamerson, who was involved in the EOA complaint, is central to this issue. Additionally, it is highly questionable why the Dean of Students would file a complaint against a student they were actively investigating, which clearly represents a conflict of interest. The incident reported by the Dean involved the plaintiff reporting an email they had received. Reporting a student for merely reporting an email is perplexing. Jamerson alleges that the plaintiff created a false email from faculty, sent it to himself, and then reported the email. However, this email provided no advantage to the plaintiff nor did it harm any faculty member; it was inconsequential. Furthermore, the plaintiff sent the email to the EOA seeking guidance on handling the situation and to be transparent. This accusation is not only absurd but also highlights the defendants' attempt to fabricate charges. The nature of phishing and the need to manufacture a false charge make this aspect of the defendants' case particularly incriminating.

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Porter: What about your access to weapons?

Lucas: My access to weapons?

Porter: Uh-huh.

Lucas: Do I – I have access to weapons, but not like in my house or anything, no.

Porter: Not in your house? Where's the access at?

Lucas: No. I mean my dad's a former Special Forces officer and he has --

Porter: So at theirs?

Lucas: -- tons of weapons, but I don't have any. I have access to them, but I don't have a need for them.

The provided transcript demonstrates that Lucas did not provide a false statement about his access to firearms to Porter. The key points in the dialogue show that Lucas clearly explained his situation:

1. **Clarification of Access**:

- **Porter**: "What about your access to weapons?"
- **Lucas**: "My access to weapons?"

2. **Explanation of Access**:

- **Lucas**: "I have access to weapons, but not like in my house or anything, no."
- **Porter**: "Not in your house? Where's the access at?"

3. **Detailing the Context**:

- **Lucas**: "No. I mean my dad's a former Special Forces officer and he has --"
- **Porter**: "So at theirs?"

4. **Reiteration of Context and Access**:

- **Lucas**: "-- tons of weapons, but I don't take any. I have access to them, but I don't have a need for them."

From this conversation, it is evident that Lucas did not lie about his access to firearms. He accurately described that while he has potential access through his father, he does not keep any weapons at his residence nor does he use them. This transparency and consistency in his answers disprove any claim that Lucas provided a false statement.

Regarding Detective Newman's Perjury:

- Det. Newman's statement that Lucas provided a false statement about his access to firearms is incorrect. The transcript clearly shows that Lucas did not make any false claims. Therefore, accusing Lucas of providing a false statement when he did not could be considered perjury on Det. Newman's part, as it involves making a false statement under oath about Lucas' testimony.

This dialogue supports Lucas' integrity and honesty in his statements to Porter, thereby challenging Det. Newman's credibility and accuracy in their claim.

Furthermore, it had already been established that the firearm inquiry was related to off-campus activities. Thus, this matter was outside the school's jurisdiction to sanction Lucas for exercising his Second Amendment right. The school's attempt to impose sanctions for an off-campus issue, which pertains to a constitutional right, further illustrates the unfair and unjust treatment of Lucas.

From: Newsom, Joel D <joel.d.newsom@Vanderbilt.Edu>
Sent: Friday, December 8, 2023 2:28:22 PM
To: Sutton, Tommye S <tommye.s.sutton@Vanderbilt.Edu>
Cc: Conwell, Patrick S <p.conwell@vanderbilt.edu>; King, Angela T <angela.t.king@Vanderbilt.Edu>
Subject: Ian Lucas update

Good afternoon, Chief.

Ian Lucas just called me on the phone and had his attorney, Adrian Bohnenberger, on the call. Mr. Bohnenberger asked me why multiple police interviews were being requested. I explained that the university had received two anonymous complaints about Mr. Lucas making statements that made the complainant unsafe. Mr. Bohnenberger asked what specifically was said in the complaint and I replied that I had gone over those statements with Mr. Lucas on Monday. I then explained that since Monday I had been following up with Mr. Lucas's classmates. Some of the classmates had supplied information saying that he had made statements of carrying a weapon to their IPE Clinicals. I also said the purpose of today's interview was to ask Mr. Lucas face-to-face about the nature of the IPE Clinicals and where they were located. Mr. Lucas verified that the clinicals are at Madison Towers, an off-campus location in a high-crime area where he does not feel safe going, but he has never carried his firearm to that location. I then asked, "So you do own a firearm?" Mr. Lucas and Mr. Bohnenberger both chimed in and said that he is a registered owner of a Glock handgun. Mr. Lucas stated that he has it for home protection and that he has never carried outside of his home even though he has a valid carry permit (that is not required in the State of Tennessee).

I then told Mr. Lucas that was all that I was wanting to talk about. Mr. Lucas then asked if we still needed to meet at 2. I said no and that he answered the questions I needed answers to. Mr. Bohnenberger asked if there had been anything criminal in nature found and I said no. I also explained that this had been communicated to other departments within the university by our department's administration. I was then asked about the campus ban. I stated that the campus ban was placed by the Dean of Students office and was not something controlled by our department.

Detective Joel D. Newsom

Lieutenant – Criminal Investigations Unit
Vanderbilt University Police Department
111 28th Avenue South Nashville, TN 37212
Email: joel.d.newsom@vanderbilt.edu
Phone: (615) 322-2745

From: Newsom, Joel D <joel.d.newsom@Vanderbilt.Edu>
Sent: Thursday, December 7, 2023 1:03:39 PM
To: Sutton, Tommye S <tommie.s.sutton@Vanderbilt.Edu>
Cc: Conwell, Patrick S <p.conwell@vanderbilt.edu>; King, Angela T <angela.t.king@Vanderbilt.Edu>
Subject: Ian Lucas update

Good afternoon.

ATF Agent Doris notified me this morning that they've found that Ian Lucas purchased a firearm in Clarksville, TN in May of this year. He neglected to mention that when Dr. Porter asked him specifically about his access to guns during our interview. I have reached out to Mr. Lucas about sitting for another interview. We will be meeting at 2800 Vanderbilt Place tomorrow at 2pm to go over this information as well as the classmates' assertions regarding his carrying of weapons. He is unavailable before then due to hosting a study group today for their final that will be given tomorrow 8am-1pm.

Detective Joel D. Newsom

Lieutenant – Criminal Investigations Unit
Vanderbilt University Police Department
111 28th Avenue South Nashville, TN 37212
Email: joel.d.newsom@vanderbilt.edu
Phone: (615) 322-2745

Follow-up with VUPD Det. Joel Newsom 2/23/24

Director of Student Accountability, Dr. Jeremy Bourgoin, followed up with VUPD Det. Joel Newsom on February 23, 2024 in response to Ian Lucas stating that the ATF check referenced for a firearm purchase in May 2023 was for a short barrel rifle that was not picked up until January 2024. Det. Newsom noted that the ATF disclosed the purchase of a Glock handgun in May 2023. He does not believe the ATF agent mentioned anything about a rifle purchase.

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Follow-up with NFD 2/26/24

A phone meeting was held between Student Accountability Director Jeremy Bourgoïn and NFD leadership. They confirmed Aaron Read was working that day and was working in place of Ian Lucas. They confirmed that the list of who worked the Covenant scene is accurate.

Vanderbilt University School of Nursing
Learning Contract
NURS (5725)
(Ian Lucas)

The following behaviors demonstrate a lack of progression toward achievement of course objectives and require a learning contract as outlined per the 5725 syllabus.

Unsatisfactory Behaviors:

- **Week 2**
Earned a 0 (zero) in the professionalism domain on the competency assessment tool (CAT) for not completing the week 1 CAT by the required deadline.
- **Week 5: Earned a 0 (zero) in the professionalism domain on the CAT for the following items:**
 - Not completing the week 4 CAT by the required deadline.
 - ~~Not completing and submitting clinical paper by the required deadline~~
 - Accessing Epic, the patient EHR system, multiple times during conference at VUSN outside hospital clinical time.
 - Copying patient information directly from the EHR for use on clinical paperwork.

Other concerns:

- Student did not pass week 4 graded clinical paperwork. Student to receive feedback on paperwork and remediate as needed and will turn in graded clinical paperwork from week 5 on Tuesday, June 6th (2023) by end of conference. Per the syllabus, failure of two successive weeks' worth of clinical paperwork is grounds for failure in the course.

Expected clinical behaviors:

- Identify an action plan that will allow for timely completion of the CAT by the required deadline.
- Complete, submit, and successfully pass second attempt at graded clinical paperwork.
- Do not access Epic outside hospital clinical time and/or copy information directly from patient's chart.

Any additional zeros earned in the Professionalism domain will result in failure of the course.

On (6/2/2023), (Ian Lucas, Mary Ann Jessee, Heather Robbins, and Angela Weaver) reviewed this document and the expectations therein.

From: [Lucas, Ian H](#)
To: [Schorn, Mavis](#)
Subject: Fwd: Important Information Regarding Your Dismissal
Date: Wednesday, January 3, 2024 1:34:46 PM

Please be advised of this email I received this morning I have already informed the EOA investigator and director.

[Get Outlook for iOS](#)

From: Lucas, Ian H <ian.h.lucas.1@Vanderbilt.Edu>
Sent: Wednesday, January 3, 2024 11:33 AM
To: Layman, Katherine <katherine.layman.1@Vanderbilt.Edu>; Cummings, E Jacob <e.jacob.cummings@Vanderbilt.Edu>
Subject: Fw: Important Information Regarding Your Dismissal

Please advise if I should send this to the Dean who is reviewing my grade appeal which is significantly important to the nature of my readmission to the school of nursing and the matter at hand regarding retaliation.

Ian

**Vanderbilt University
General Incident Reporting Form**

Submitted on January 4, 2024 at 2:41:34 pm CST

Nature	General
Urgency	Normal
Incident Date and Time	2024-01-03
Incident Location	Off-Campus

Reported by

Name:	Neil Jamerson
Title:	Associate Dean
Email:	
Phone	
Address:	

[UNAUTHENTICATED]

Involved Parties

Ian Lucas (000322273)
Alleged

Questions

Please provide a detailed description of the incident/concern using specific, concise, objective language.

VUSN reported Ian Lucas forwarded the following email to VUSN and EOA with the included attachment. The attachment has also been included on anonymous reports to the University hotline.

**"From: Lucas, Ian H less thanian.h.lucas.1@Vanderbilt.Edugreater than
Sent: Wednesday, January 3, 2024 1:35 PM
To: Schorn, Mavis less thanmavis.schorn@Vanderbilt.Edugreater than
Subject: Fwd: Important Information Regarding Your Dismissal**

Please be advised of this email I received this morning I have already informed the EOA investigator and director.

**From: Lucas, Ian H less thanian.h.lucas.1@Vanderbilt.Edugreater than
Sent: Wednesday, January 3, 2024 11:33 AM
To: Layman, Katherine less thankatherine.layman.1@Vanderbilt.Edugreater than; Cummings, E Jacob less thane.jacob.cummings@Vanderbilt.Edugreater than
Subject: Fw: Important Information Regarding Your Dismissal**

Please advise if I should send this to the Dean who is reviewing my grade appeal which is significantly important to the nature of my readmission to the school of nursing and the matter at hand regarding retaliation.

"From: Lucas, Ian H less thanian.h.lucas.1@Vanderbilt.Edugreater than
Sent: Wednesday, January 3, 2024 1:35 PM
To: Schorn, Mavis less thanmavis.schorn@Vanderbilt.Edugreater than
Subject: Fwd: Important Information Regarding Your Dismissal

Please be advised of this email I received this morning I have already informed the EOA investigator and director.

From: Lucas, Ian H less thanian.h.lucas.1@Vanderbilt.Edugreater than
Sent: Wednesday, January 3, 2024 11:33 AM
To: Layman, Katherine less thankatherine.layman.1@Vanderbilt.Edugreater than; Cummings, E Jacob less thane.jacob.cummings@Vanderbilt.Edugreater than
Subject: Fw: Important Information Regarding Your Dismissal

Please advise if I should send this to the Dean who is reviewing my grade appeal which is significantly important to the nature of my readmission to the school of nursing and the matter at hand regarding retaliation.

Ian

From: Concerned Faculty less thanconcernedfaculty@vanderbilt.edugreater than
Sent: Wednesday, January 3, 2024 10:03 AM
To: Lucas, Ian H less thanian.h.lucas.1@vanderbilt.edugreater than
Subject: Important Information Regarding Your Dismissal

Dear Ian,

I hope this message finds you in good health. I'm reaching out to you anonymously due to the sensitive nature of this issue. After careful consideration, I've decided that it's crucial for you to know the truth about the circumstances leading to your recent dismissal. Evidence has come to my attention that suggests you were unjustly set up by certain faculty members, which ultimately led to your dismissal. This revelation is troubling, and it's important that you are made aware of this injustice. Attached to this message, you'll find detailed evidence supporting these claims. This includes emails, meeting notes, and other relevant documents. I urge you to review these carefully. It's essential for your understanding of what transpired and for any steps you might consider taking to address this situation. I must emphasize the need for confidentiality. I am providing this information to assist you, but I must remain anonymous to avoid potential retaliation. The decision to act on this information is yours, and I hope it will help you in seeking a fair resolution. Please know that not all members of the faculty share the views or actions of those involved in your dismissal. There are those among us who believe in fairness and justice, and it's in this spirit that I share this information with you. Wishing you the best in navigating this challenging situation.

Sincerely,

A Concerned Faculty Member"

VUIT reviewed given concerns that the `concernedfaculty@vanderbilt.edu` was a spoofed email address. VUIT found there is no `concernedfaculty@vanderbilt.edu` email address in their environment. This particular email came from an IP address 5.181.77.28, owned by G-Core Labs S.A., which is a provider for content delivery. VUIT found that at 10:03 AM `ian.h.lucas.1@vanderbilt.edu` (Exchange) released a message from quarantine from `concernedfaculty@vanderbilt.edu` with noted typo. At 10:09 AM a corrected version was outright blocked by Microsoft security. Then at 10:26 AM there was a forward from `ian.h.lucas@vanderbilt.edu` (VU Gmail) to `ian.h.lucas.1@vanderbilt.edu` (Exchange) of the same message but with a "corrected" sender address.

+

Based on this investigation, I asked the following of VUIT, "Do we think it's more likely than not based on this review that the originator of the email was Ian? Alternatively, it appears if I am reading this correctly that Ian (or someone accessing Ian's email) corrected the typo then represented it to VUSN as coming from a Vanderbilt.edu address without a typo?"

VUIT responded, "I would find it difficult to believe they weren't involved in some capacity. One red flag to me is the send to their Exchange account and their VU Gmail address, since they are separate accounts, with the Exchange account being the current mail delivery address. Another red flag is the forwarding from VU Gmail on their phone to Exchange to correct the typo in the sending address, which you were reading correctly.

I can also confirm all recent login attempts have been local and would not suggest account compromise."

Accordingly, I am referring as it appears Lucas may have provided false information to the University in connection with an active EOA investigation.

Attachments
imo9040.ibe

Incident Report Submitted by Lisa Clapper on 12/12/23 at 9:21 AM

Please provide a detailed description of the incident/concern using specific, concise, objective language.

Ian Lucas exhausted his allotted Student Care Assistance Program funds (\$2000 per student). In May of 2023 he requested additional funds to assist with therapy and psychiatry related to his involvement in a "school shooting." Lucas had shared with others in the Vanderbilt School of Nursing that he had been on site for the Covenant School shooting, including pronouncing the shooter and one of the students dead.

Jamye Hardy made the following note related to the request for additional funds:

"JAH reached out to student by phone to inquire about 2nd SCAP application requesting 2000 (student has used all SCAP funds for this academic year) where student named that he was involved in recent school shooting and needed ongoing mental health care. JAH inquired about whether student has explored OON Benefits with BCBS and student named that he has not submitted for this because it takes 6 months to receive reimbursement and that the percentage is not worth the work of submitting for reimbursement. Student named that he could explore other therapy options that are in network with his Care Coordinator. IAQ to reach out to student to talk him through options, including requesting sliding scale with his current therapy provider at Nashville Psych. JAH consulted w. LAC and student is approved for additional \$1000. JAH to email student to confirm additional funding opportunity for ongoing therapy. JAH"

In the course of its investigation into other allegations involving Lucas, VUPS reached out to Metro for a list of those who responded to the Covenant shooting (attached). Lucas is not identified. When questioned, Lucas claimed he asked for his name to be removed. When VUPS followed up with Metro, they were informed no one had asked for their name to be removed from the list. Moreover, Lucas has widely shared his involvement with those at VUSN.

Attachments

reianlucas.pdf

nfdemsresponderlistforcovenantshooting.pdf

img4909.jpeg

From: [King, Angela T](#)
To: [Jamerson, Neil E](#); [Sutton, Tommye S](#); [Conwell, Patrick S](#)
Cc: [Gladu, William A](#); [Newsom, Joel D](#)
Subject: NFD/EMS Responder List for Covenant shooting
Date: Wednesday, December 6, 2023 2:43:09 PM
Attachments: [IMG_1909.jpeg](#)
[image001.png](#)

Please see the list of responders for the Covenant shooting, this was sent to me from Matthew Tidwell, NFD District Chief of EMS Special Operations. He informed me that Ian Lucas was not a responder for the incident.



Angela T. King
Captain, Criminal Investigations Unit
Vanderbilt University Police Department
615.322.2745 | angela.t.king@vanderbilt.edu | <https://police.vanderbilt.edu>
Cell Phone: 615.438.7142
111 28th Avenue South
Nashville, TN 37212

Incident Report Submitted by Dr. Mary Ann Jessee on 12/12/23 at 12:55 PM

Please provide a detailed description of the incident/concern using specific, concise, objective language.

Faculty member Monika Schmidt at VUSN contacted me this week with an allegation that VUSN student Ian Lucas submitted a falsified school excuse note from Blanchfield Army Community Hospital. She became aware of this note as part of the ongoing investigation into this student's conduct. Monika is a nurse practitioner at the Nashville VA, and has extensive knowledge of military communication templates, clinic locations and purposes, and veteran eligibility for VA services. Her concern is that this student cut/pasted the Department of Defense logo onto a document the student forged, and that the student is not eligible for the clinic from which this note seems to originate. Monika can be reached at [REDACTED] or monika.schmidt@vanderbilt.edu.

Attachments

originalmdformissed6022class.pdf

Investigative Meeting
Professor Monika Do

Professor Do was interviewed to review concerns raised about the validity of an excuse note provided to her by Ian Lucas. Professor Do noted there were multiple “red flags” about the note as she reviewed it, given she works for the VA and is familiar with this kind of documentation.

Above all, Professor Do was signaled to the note coming from the Blanchfield Army Community Hospital. This hospital is only available to Tri-Care beneficiaries—meaning Ian would need to be active duty military personnel, married to active duty military personnel, or be a child under the age requirement for an active duty military personnel. Professor Do noted that Ian did not meet any of those requirements and could not have attended clinic there. She speculated that Ian potentially went to this location before and had an excuse note from before when he was eligible for their services and modified it for use as an excuse in the School of Nursing.

Professor Do also noted there were multiple other “red flags” such as the letterhead itself not being correct. The DoD seal doesn’t go with the Department of the Army notation at the top. She noted that you can see where the bottom of the seal is cut off where it was pasted in. That seal is available on Google. The actual letterhead used is provided by the employer and is kept rigidly under specific requirements. She also noted that this is supposed to be an actual physical stamp and then signed on top. She noted that it was clearly added after digitally as it cuts off the font of the bottom line. Professor Do noted this would normally be blue or red so black is also uncommon. She pointed out multiple misspellings, including the words absence and necessary that would not be logically be found in a template letter.

VUSN: AT1
Pr: Vanderbilt - YES
02 Lucas, Ian - Outline
My Health - Home
CHARTPT
Vanderbilt Learning...
Duke MyChart
OneStop Austin Pg...
APSU

PATIENT PORTAL
TRICARE Online

Service Separation | FAQs | Resources | Contact Us | Log Out

Today's Date: Tuesday, 05 Mar 2024, Last Login: 27 Feb 2024 @ 09:17
Switch to Mobile

Military Health Care Facility: Screaming Eagle Med Home-Campb (update) | Family Sponsor: Ian Lucas |

Home
Appointments
Prescriptions
Health Record
Profile
MHS GENESIS

My Profile

Update MTF
Help: Mobile US Carrier
Help: Mobile Carrier (Intl/Other)
Help: Update MTF

My Profile

Input your email and check the box in the Confirmation and Reminder Recipients section to receive appointment, prescription, and lab result notifications. Input your mobile number and select your mobile carrier to receive text notifications. Note: Standard text messaging rates apply – check with your mobile device carrier.

Name: Ian H Lucas
DOB: 26 Aug 1993
Sponsor ID: SSN ****-6580
Person ID: SSN ****-6580
MTF: Screaming Eagle Med Home-Campb
PCM: not found
Clinic: not found

Service Affiliation: (required)
Office of the Secretary of Defense

Primary Email: (required)
ian.lucas@who.eop.gov

Primary Mobile:
910-872-3577

Mobile Carrier:
Verizon

[Help with setting up International/Other Mobile Carriers](#)
[Examples for setting up German Mobile Carriers](#)

Notification Settings

☐ No, I do not wish to receive appointment, prescription, or lab result notifications.
☒ Yes, I want to be notified when I:

- make or cancel an appointment or if an earlier appointment becomes available.
- request a refill or new fill.
- have new lab results.

TOL sends messages to the primary email and mobile number provided above (ian.lucas@who.eop.gov and 910-872-3577).

Survey Settings

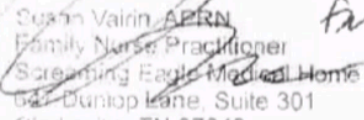
To Whom It May Concern:

17 JUNE 2022

I am writing this letter reference Ian Lucas whom I have known for multiple years. Ian was a patient of mine and over the years had the opportunity to get to know him and his interest in learning, medicine and his desire to help others. He has had multiple jobs which all were involved in helping others. Ian has been a paramedic, flight respiratory therapist and now is employed as a Critical Care Paramedic.

Ian's interest in increasing his education is exciting and I know he would be a great asset to the medical community as a Nurse Practitioner.

I would highly recommend Ian be admitted to Vanderbilt's Nurse Practitioner program. He has what it takes to be very successful at whatever he pursues.


Susan Vairin, APRN
Family Nurse Practitioner
Screaming Eagle Medical Home
642 Dunlop Lane, Suite 301
Clarksville, TN 37040

Susan Vairin Family Nurse Practitioner questions 9312165217

Graduate of Vanderbilt's program and a preceptor to many of Vanderbilt's students



**DEPARTMENT OF THE ARMY
BLANCHFIELD ARMY COMMUNITY HOSPITAL
SCREAMING EAGLE MEDICAL HOME
650 JOEL DRIVE, FORT CAMPBELL, KY, 4223**

19 August 2022

MEMORANDUM FOR: Vanderbilt University School of Nursing Admissions

FOR: Ian Lucas-Pediatric Nurse Practitioner/Primary Care - MSN - 2023 Fall Application
Reference number: 206103114

SUBJECT: Letter of Recommendation

As a graduate of Vanderbilt School of Nursing and now as a preceptor to many VUSN Nurse Practitioner students, I am writing to highly recommend Ian Lucas for admission to the Primary Care Pediatric Nurse Practitioner program. I have known Ian for multiple years as a patient and as a health care professional. As a Pediatric Respiratory Therapist and Critical Care Paramedic Ian has transported and cared for many injured and critically ill pediatric patients. I genuinely admire Ian for his abilities, and skills as a naturally compassionate and caring clinician devoted to his patients and their families.

Ian has devoted his career to pediatrics having worked in the PICU, NICU, and the Level I Pediatric Trauma and Pediatric ER at Vanderbilt Children's Hospital and as a member of Neonatal/Pediatric Critical Care Flight Team's at many other tertiary pediatric care centers such as UNC Children's, Wake-Med Children's and Duke Children's. Ian is well experienced and knowledgeable in pediatric care and with his background, experience and dedication to pediatric patient care I support his ambition in pursuing to become a Primary Care Pediatric Nurse Practitioner. Ian has the goal to provide care in rural and medically underserved communities, and ultimately help to increase accessibility and provide pediatric care to these communities in order to prevent manageable conditions from reaching the point of exacerbation requiring the need for emergency intervention or critical care.

Given his motivation, ambition, and resilience to be successful especially in a rigorous academic program such as this. As an alumni and preceptor for Vanderbilt School of Nursing I know Ian would be a great asset to the patients he will care for, the Pediatric Nurse Practitioner profession and to the communities he will serve and Nursing profession. It is with pleasure that I highly recommend and support the admission of Ian Lucas to Vanderbilt University School of Nursing.

If I can be of any further assistance please contact me at 931-216-5217,

Sincerely,

Newsom: Okay. Just so – I know you talked to Captain King a few hours ago after – shortly after you got that e-mail –

Lucas: Uh-huh.

Newsom: -- from Dr. Jamerson (phonetic). I just want to read this to you, and just to let you know this is called our Vanderbilt Police Department non-custody form. It's like – it's

just acknowledging you're not under arrest; you're taking part in this interview of your own free will; you're free to go at any time; and you're free to take a break or leave at any time during the process. You understand what you're doing, and there have been no pressure, threats, or coercion of any kind used against you; and you understand that the information obtained during this process – well, this is what it says is that during the process -- will be reviewed by the District Attorney's Office for possible disposition. But this is not a – it's not a criminal inquiry 'cause like -- 'cause there's nothing that we found is criminal in nature. Okay? But, let's see, basically – it's basically you're agreeing to talk to Lieutenant Gladu and I.

+

just acknowledging you're not under arrest; you're taking part in this interview of your own free will; you're free to go at any time; and you're free to take a break or leave at any time during the process. You understand what you're doing, and there have been no pressure, threats, or coercion of any kind used against you; and you understand that the information obtained during this process -- well, this is what it says is that during the process -- will be reviewed by the District Attorney's Office for possible disposition. But this is not a -- it's not a criminal inquiry 'cause like -- 'cause there's nothing that we found is criminal in nature. Okay? But, let's see, basically -- it's basically you're agreeing to talk to Lieutenant Gladu and I.

Lucas: For a non-criminal inquiry.

Newsom: For a non-criminal inquiry, yes.

Newsom: What time do you – what time you got, Bill?

Gladu: 3:42.

Newsom: 3:42. All right. So – yeah. You got a pen? All right.

Lucas: I'm the top, I'm assuming?

Newsom: Yeah. Right – right – yeah. Right above where I just signed so.

Lucas: Guess I got this.

Newsom: Okay.

Newsom: And what's your -- what's your current employment, like --

Lucas: I work for Air Evac Life Team out of Paris, Tennessee, as a flight paramedic.

Newsom: You said -- you said Air Evac Flight Team?

Lucas: It's Air Evac Lifeteam.

Newsom: Oh. Lifeteam.

Lucas: Uh-huh.

Newsom: So does that fall under -- oh --

Lucas: Falls under GM -- under GMR.

Newsom: Okay. I know Vanderbilt LifeFlight operates out of Paris, too. They got a --

Lucas: Yeah.

Newsom: Is that a part of the same thing or --

Lucas: No.

Newsom: Okay. All right. How long have you been with Air Evac Lifeteam?

Lucas: I joined them, actually, October of last year. So this will be a year and a few months.

Newsom: Okay. All right. And have you ever been employed with LifeFlight here at Vanderbilt?

Lucas: I have been.

Newsom: Okay. When did that – how long did you do that?

EXHIBIT E

The Exhibits above show the inconsistencies with the information presented in EXHIBITS A thru D.